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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Jacqueline Garcia,

Plaintiff,

v.

Eric S. Cohan, Stephanie Syptak-Ramnath,  
Antony Blinken,

Defendants.

Case No: 2:23-cv-00849-CDS-MDC

**Unopposed Motion for Extension of  
Time**

**(Seventh Request)**

The Federal Defendants respectfully move for an additional 30-day extension of time, from March 21, 2024, to April 22, 2024, to file a response to Plaintiff's Complaint (ECF No. 1). This is the seventh request for an extension of time. Undersigned defense counsel has inquired with Plaintiff's counsel, who agrees with this request. Indeed, Plaintiff's counsel would like additional time to consult with Plaintiff.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. In this case, the Federal Defendants request additional time to file a response to the Complaint for the reasons set forth below.

Without admission or waiver by the parties, Federal Defendants inform the Court that reasons for some of the recent extensions related to agency action by the Department of State and some needed time for Plaintiff's counsel to confer with Plaintiff about such

1 action. More recently, there has been agency action by the U.S. Citizenship and  
2 Immigration Services (USCIS), and Plaintiff's counsel needs additional time to confer with  
3 Plaintiff about such action.

4 This motion is filed in good faith and not for the purposes of undue delay.  
5 Accordingly, Federal Defendants respectfully request, and Plaintiff's counsel consents to,  
6 this extension of time, from March 21, 2024, to April 22, 2024, to file a response to  
7 Plaintiff's Complaint.

8 Respectfully submitted this 21st day of March 2024.

9 JASON M. FRIERSON  
10 United States Attorney

11 /s/ Patrick A. Rose  
12 PATRICK A. ROSE  
13 Assistant United States Attorney

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15 **IT IS SO ORDERED**

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19 **Maximiliano D. Couvillier III**  
20 **UNITED STATES MAGISTRATE JUDGE**  
21 **DATED: March 25, 2024**  
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